

1 ALICE K. HERBOLSHEIMER, ESQ.
Nevada Bar No. 6389
2 LEWIS BRISBOIS BISGAARD & SMITH LLP
5555 Kietzke Lane, Suite 200
3 Reno, Nevada 89511
775.827.6440
4 FAX: 775.827.9256
Email: Alice.Herbolsheimer@lewisbrisbois.com

5 Attorneys for National General Assurance
6 Company

7
8 UNITED STATES DISTRICT COURT
9 DISTRICT OF NEVADA

10 NATIONAL GENERAL ASSURANCE
11 COMPANY,

12 Plaintiff,

13 vs.

14 DWAIN ROCKWOOD TURNER, an
individual; DOES I-V,

15 Defendants.
16

CASE NO. 2:19-cv-01713

**STIPULATION AND ORDER TO
EXTEND TIME TO FILE OPPOSITION
AND REPLY TO MOTIONS FOR
SUMMARY JUDGMENT
(Second Request)**

17 Intervenor, Helal Sekder ("Sekder"), filed a Motion for Summary Judgment Regarding
18 Coverage on 1/10/20. Plaintiff, National General Assurance Company ("NGAC") filed an
19 Opposition to Sekder's MSJ on 1/30/20. Additionally, NGAC filed a Counter-Motion for
20 Summary Judgment Regarding Coverage on 1/31/20.

21 The parties had previously stipulated and obtained court approval to extend the time for
22 Sekder to file his Reply in Support of his Motion for Summary Judgment and his Opposition to
23 NGAC's Counter-Motion for Summary Judgment, to March 13, 2020 and March 23, 2020,
24 respectively. The purpose of the extension was to enable NGAC to effectuate a substitution of
25 counsel and to allow the parties to further explore settlement potential before incurring additional
26 time and expense to finish briefing the pending motions.

27 The parties hereby stipulate to extend the filing deadlines for another 30 days, to April 13,
28 2020 and April 23, 2020, due to an unanticipated delay in getting the file transferred from

1 NGAC's former counsel to its new counsel. Additionally, the file is nearly 4,500 pages, and
2 counsel will need additional time to review the file in order to fully evaluate Sekder's settlement
3 demand. This is the parties' second request for an extension of time, and it is being made in good
4 faith and not for any improper or dilatory purpose.

5 DATED this 4th day of March, 2020.

DATED this 4th day of March, 2020.

6 /s/ Jesse M. Sbaih

/s/ Alice K. Herbolsheimer

7 By: _____

By: _____

Jesse M. Sbaih, Esq.

Alice K. Herbolsheimer, Esq.

8 JESSE SBAIH & ASSOCIATES, LTD.

LEWIS BRISBOIS BISGAARD &

The District at Green Valley Ranch

SMITH LLP

9 170 South Green Valley Parkway, Suite 280

5555 Kietzke Lane, Suite 200

Henderson, NV 89012

Reno, Nevada 89511

10 *Attorneys for Intervenor, Helal Sekder*

Attorneys for Plaintiff, NGAC

11
12 IT IS SO ORDERED.



14 RICHARD F. BOULWARE, II
15 UNITED STATES DISTRICT JUDGE

16 DATED this 9th day of March, 2020.

1 **CERTIFICATE OF SERVICE**

2 Pursuant to FRCP Rule 5(b), I certify that I am an employee of LEWIS BRISBOIS
3 BISGAARD & SMITH LLP and that on this 4th day of March, 2020, I caused a true and correct
4 copy of **STIPULATION AND ORDER TO EXTEND TIME TO FILE OPPOSITION AND**
5 **REPLY TO MOTIONS FOR SUMMARY JUDGMENT (Second Request)** to be served via
6 the court's electronic system to the following:

7 Jesse M. Sbaih, Esq.
JESSE SBAIH & ASSOCIATES, LTD.
8 The District at Green Valley Ranch
170 South Green Valley Parkway, Suite 280
9 Henderson, NV 89012

10 Thomas E. Winner, Esq.
11 Steven C. Devney, Esq.
WINNER & SHERROD
12 1117 South Rancho Drive
Las Vegas, Nevada 89102
13
14

15 By /s/ Sherie Morrill
16 An Employee of
LEWIS BRISBOIS BISGAARD & SMITH LLP
17
18
19
20
21
22
23
24
25
26
27
28